

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

SEAN COMBS,

Defendant.

VICTIM-4 ATTORNEY DECLARATION

24 Cr. 542 (AS)

STATE OF NEW YORK)
COUNTY OF NEW YORK) ss.
SOUTHERN DISTRICT OF NEW YORK)

I, Michael Ferrara, declare under penalty of perjury, upon information and belief, as follows:

1. I am a member of the bar of the State of New York, a partner at the law firm Hecker Fink LLP, and counsel to Victim-4 in the above-captioned action.
2. I respectfully submit this declaration in support of the government's April 4, 2025 motion in limine to protect the identities of certain victims, including Victim-4, ECF 211, and pursuant to the Court's April 22, 2025 Order to "furnish evidence to support an actual risk of harm to [Victim-4]" if she were required to testify without the protection of a pseudonym.
3. Victim-4 has already endured substantial emotional and psychological trauma as a result of the experiences about which she will testify at defendant Sean Combs's upcoming trial. As a result of this trauma, Victim-4 has struggled with [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Without the protection of a pseudonym, Victim-4 faces a substantial risk of additional, irreparable harm to her prospects of employment, [REDACTED], and close personal relationships, not to mention to her safety and emotional and psychological recovery process, which continues to this day.

4. Contrary to Mr. Combs's assertions, Victim-4 is neither ambivalent about, nor interested in, testifying using her real name, and seeks the protection of a pseudonym to prevent the actual and specific threat of harm described below.

I. Much of Victim-4's Most Sensitive Testimony Is Unknown to the Public

5. I understand that Victim-4's testimony will almost certainly involve [REDACTED]

[REDACTED]

[REDACTED] Victim-4's anticipated testimony in this regard is obviously extremely sensitive in nature and would result in humiliating and retraumatizing publicity if Victim-4 is required to testify using her real name.

6. Victim-4 has never spoken publicly about, or otherwise publicized, [REDACTED]

[REDACTED]

[REDACTED]

7. Victim-4 acknowledges the possibility that the media or public will connect the dots and identify her. But even if the protection of a pseudonym does not make it impossible for someone to identify her, Victim-4 also hopes that her clear preference to keep her identity secret might prompt the media or public to respect her decision and not publish her name even if they are able to do so.

II. Emotional and Mental Harm

8. The circumstances that Victim-4 endured [REDACTED]

[REDACTED]

[REDACTED]

9. Victim-4 has [REDACTED]

Although she has made progress, the prospect of testifying about her experiences has triggered significant anxiety as she revisits many of the most traumatic experiences of her life.

10. If Victim-4 is required to testify about these traumas without the protection of a pseudonym, her hard-fought progress will undoubtedly be negatively impacted, and her emotional and psychological anguish worsened, including because she faces the risk of becoming publicly and permanently associated with the very traumatic circumstances she has spent years trying to move on from.

III. Professional and Material Harm

11. Beyond the emotional and psychological toll, Victim-4's public identification in the course of her testimony would significantly jeopardize her professional prospects.

12. [REDACTED]

[REDACTED]

[REDACTED]

But if she is forced to testify without the protection of a pseudonym, her efforts will be hampered.

IV. Fear of Reprisal and Harassment

13. Finally, Victim-4 is legitimately fearful of the substantiated risk of harassment and reprisal from Mr. Combs and his supporters if she is forced to testify without the protection of a pseudonym.

14. As the Court is well aware, Mr. Combs has already been found to have engaged in numerous instances of witness tampering and harassment both directly and with the assistance of other individuals operating at his direction. *See* ECF 92 at 2–3.

15. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

16. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

17. For Victim-4, this experience of harassment is all too familiar. As a result of her experiences of abuse and trauma, Victim-4 maintains a constant fear that [REDACTED]
[REDACTED]

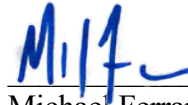
18. Indeed, this fear of reprisal is so acute that Victim-4 [REDACTED]
[REDACTED]
[REDACTED]

19. [REDACTED]
[REDACTED] If Victim-4 is forced to testify using her real name, it will only exacerbate this pattern of harassment.

20. In sum, in order to protect her privacy, avoid humiliation, avert harassment, and prevent an adverse impact on her ability to earn an income, [REDACTED], and continue to pursue emotional and psychological treatment and recovery, Victim-4 respectfully requests that the Court permit her to testify under a pseudonym.

21. I declare under penalty of perjury that the foregoing is true and correct upon information and belief.

Dated: New York, New York
April 23, 2025



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